

NATIONAL SECURITY PROJECT



May 6, 2015

By ECF

Honorable T. S. Ellis, III
United States District Court for the Eastern District of Virginia
Albert V. Bryan United States Courthouse
401 Courthouse Square
Alexandria, VA 22314

Re: *Wikimedia Foundation et al. v. National Security Agency et al.*
Case No. 15-cv-00662-TSE (D. Md.)

Dear Judge Ellis:

Pursuant to District of Maryland Local Rule 101.1(b)(i), Plaintiffs in the above-referenced case respectfully request that local counsel, Deborah Jeon and David Rocah, be excused from attending the status conference scheduled for May 13, 2015, due to a preexisting commitment. Patrick Toomey and Jameel Jaffer, counsel for Plaintiffs who have been admitted pro hac vice in this matter, intend to appear at the status conference on behalf of Plaintiffs.

Local Rule 101.1(b)(i) requires that “Any party represented by an attorney who has been admitted pro hac vice must also be represented by an attorney who has been formally admitted to the Bar of this Court who shall sign all documents and, unless excused by the presiding judge, be present at any court proceedings.” Ms. Jeon and Mr. Rocah are scheduled to attend an all-day organizational meeting on May 13, 2015. They respectfully request that the Court waive the local rule’s requirement for the upcoming status conference in light of this scheduling conflict and the fact that lead counsel for Plaintiffs will be present at the conference.

Defendants have informed Plaintiffs that they consent to this request.

Respectfully submitted,

/s/

Deborah A. Jeon (Bar No. 06905)
David R. Rocah (Bar No. 27315)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MARYLAND

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2500
WWW.ACLU.ORG

OFFICERS AND DIRECTORS
SUSAN N. HERMAN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

RICHARD ZACKS
TREASURER

3600 Clipper Mill Rd., #350
Baltimore, MD 21211
Phone: (410) 889-8555
Fax: (410) 366-7838
jeon@aclu-md.org

/s/

Patrick Toomey (pro hac vice)
*(signed by Patrick Toomey with
permission of Debbie A. Jeon)*
Jameel Jaffer (pro hac vice)
Alex Abdo (pro hac vice)
Ashley Gorski (pro hac vice)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Phone: (212) 549-2500
Fax: (212) 549-2654
ptoomey@aclu.org

Charles S. Sims (pro hac vice)
David A. Munkittrick (pro hac vice)
John M. Browning (pro hac vice)
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Phone: (212) 969-3000
Fax: (212) 969-2900
csims@proskauer.com

Counsel for Plaintiffs

cc: James Gilligan, Esq. (by ECF)
Julia Berman, Esq. (by ECF)
Rodney Patton, Esq. (by ECF)

Counsel for Defendants